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FEDERAL COMMUNICATIONS  
COMMISSION

by hand

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: CC Docket No. 92-105

Dear Mr. Caton:

On October 10, 1996, the Association of Public-Safety Communications Officials-International, Inc. ("APCO") filed comments in the above-referenced proceeding regarding the reservation of "3-1-1" as a national non-emergency telephone number. As a supplement to those comments, APCO is hereby submitting the enclosed position statements regarding 9-1-1 and non-emergency numbers.

Please contact the undersigned should the Commission have any questions regarding this information.

Respectfully submitted,

WILKES, ARTIS, HEDRICK & LANE,  
Chartered

By:

  
Robert M. Gurss

Counsel for APCO

Enclosure

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**APCO  
PROJECT 35**

**POSITION STATEMENTS  
AND  
NEWS RELEASE  
REGARDING**

**THE PROPOSAL TO CREATE A  
NATIONWIDE PUBLIC SAFETY  
NON-EMERGENCY ALTERNATIVE TO  
9-1-1**

## EXECUTIVE SUMMARY

In August 1996, President Clinton and the United States Department of Justice advanced a proposal to create a nationwide public safety non-emergency alternative to 9-1-1. Following the President's lead, the U.S. Department of Justice petitioned the Federal Communications Commission to reserve the telephone dialing digits "3-1-1" for use in public safety operations. While the idea generated both positive and negative reactions from the public safety community, APCO realized that the issue needed a comprehensive review. In late August, the APCO Board of Officers commissioned a group committee project "APCO Project 35" which was tasked to perform an objective review of this issue and to establish a viable position on the matter.

Following its establishment, the Project 35 team engaged in extensive research into similar projects in major metropolitan areas including Baltimore, MD, Washington DC, and Dallas, TX. A meeting was sponsored by APCO and took place on January 17, 1997 in Washington DC. A number of topics, some of which are contained in this paper, were discussed in great detail in the course of the committee's deliberations. After the meeting, the Project 35 committee presented its views and received feedback from various associations with public safety interests as well as government agencies including representatives from the FCC Common Carrier Bureau and the Department of Justice Community Oriented Policing Services program.

After researching, debating, and considering every facet of an N-1-1 system, APCO Project 35 concluded that non-emergency access is essential to public safety but acknowledged that N-1-1 is only one of several options. Further, it was agreed that N-1-1 can have various uses that are best determined by individual local or state governments. At the close of its meeting, the APCO Project 35 committee determined that non-emergency N-1-1 access is still in its developmental stages and it is important that APCO continue to gather additional information.

## **POSITION STATEMENT ON 9-1-1**

Proponents of the N-1-1 system based their support on media comments that 9-1-1 systems across the nation "were drowning" and that 9-1-1 was a "victim" of its own success. In congruence with the evaluation of non-emergency access alternatives, it is important to address the state of 9-1-1 in America today.

### **9-1-1 is not universal**

There are an estimated 32,000,000 citizens in the United States that do not have access to basic 9-1-1 service<sup>1</sup>. This is a representation of sixteen percent of the U.S. population.

### **The majority of 9-1-1 systems are not overloaded**

While the media highlights 9-1-1 horror stories, the clear majority of 9-1-1 callers receive prompt and efficient service. Millions of calls are successfully placed to 9-1-1 centers in the United States annually.

### **Most 9-1-1 system problems are in large urban areas and are the result of insufficient personnel resources**

The single largest problem facing 9-1-1 in large urban areas is a lack of sufficient personnel resources to answer the incoming call load. Even with public education directing callers to an alternate non-emergency number, there would need to be additional staff to properly manage the call volume.

### **9-1-1 solutions must be multifaceted and global in origin**

Where 9-1-1 system problems exist, there is no easy resolution. Each community needs to assess its staffing levels, training programs, use of technology, and public education to fashion their own plan. Each of these elements is an essential component in the 9-1-1 chain.

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<sup>1</sup> Based on data provided by the National Emergency Number Association (NENA) which reported that 16% of the population does not have access to 9-1-1.

## **POSITION STATEMENT ON NON-EMERGENCY ACCESS TO PUBLIC SAFETY SERVICES**

### **All public safety agencies should have a functional non-emergency access number**

Providing an easy to remember and well publicized non-emergency access number is a cornerstone to proper use of the 9-1-1 system. However, some agencies do not have a non-emergency number, or their non-emergency number is buried in the phone book and cannot be located. Most agencies effectively use seven digit numbers, some use toll free "800" numbers and Baltimore, MD is the first to use an N-1-1 number for non-emergency access.

### **Public education on proper emergency and non-emergency access is of paramount importance**

With few exceptions, public education on the proper use of 9-1-1 has been confined to the initiation or "kick off" of the system. Very few communities maintain an aggressive campaign to constantly remind their citizens when to call 9-1-1 and when to use the non-emergency access number. APCO found public education to be the single most important factor affecting the use of 9-1-1.

### **There are many ways a community might logically implement an N-1-1 system to meet its own needs**

Some communities may need to create a non-emergency call taking system, which parallels the 9-1-1 system and gives citizens an easy to remember number to report calls for service. Other communities may desire to implement an N-1-1 system to route callers to community policing substations where the caller can speak to the officer assigned to their neighborhood, or leave a voice mail message for that team of officers. Still other communities, such as Dallas and Washington DC, have expressed a need for a citywide government services access number where a caller can receive assistance on all public safety and public service programs.

### **At the federal level, 3-1-1 should not be designated for a singular use, which would limit the flexibility needed by local communities**

APCO believes that in order to give each community the flexibility it may need, that the FCC should reserve 3-1-1 for use by local governments for public safety or public service functions. APCO further believes that it is unlikely that a majority of the nation will implement an N-1-1 system, and will instead continue to use existing seven digit and "800" numbers for this function. The potential for significant public confusion may result if the 3-1-1 number is reserved or labeled

as a nationwide non-emergency public safety access number. APCO recommends that the FCC not create the perception that 3-1-1 is a nationwide number, such as 9-1-1, but instead reserve the digits for government access.

**Implementation of an N-1-1 system should be allowable under FCC rule and should be authorized by each state's Public Service Commission (PSC) or Public Utilities Commission (PUC)**

APCO believes that the proper oversight for authorization and implementation should be each state's PSC or PUC's responsibility. Currently, the FCC gives responsibility to these groups for implementation of good public policy. APCO does not see a need for a federal mandate to guide N-1-1, and also does recommend that the decision to initiate an N-1-1 system be left up to individual municipalities and units of local government.

**Certain standards should accompany N-1-1 use**

APCO recommends that certain standards and requirements be placed on communities who wish to activate an N-1-1 system. These standards would most likely be adopted by the state PSC/PUC group and would include technical and policy issues to make N-1-1 a safe and efficient system. Some of these issues include wireless access, ability to escape to 9-1-1, and selective routing.

**A functional 9-1-1 system must be in place before a community adds an N-1-1 system**

APCO feels strongly that 9-1-1 system access must be in place before a community installs an N-1-1 system.